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March 30, 2020

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**BY ECF**

Hon. Naomi Reice Buchwald  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *United States v. Roberson*, No. 1:19-cr-914

Dear Judge Buchwald,

As counsel for Marcus Roberson in the above-captioned matter, we write to respectfully request a two-week extension of the deadlines the Court set on March 12, 2020, regarding the filing of any possible motion to suppress in this case. We make this request for a brief extension because since the Court set the original briefing schedule on March 12, the COVID-19 pandemic has caused a number of unexpected business disruptions, including the closure of Ropes & Gray's U.S. offices and serious difficulties in our ability to communicate with our client (including suspension of in-person legal visits at MCC). The motion is currently due on Thursday, April 2, 2020. This is our first request for an adjournment of the briefing schedule, and Mr. Roberson consents to the exclusion of this additional time under the Speedy Trial Act.

If the Court grants this request, the corresponding briefing schedule will be as follows: initial motion papers due on April 16; government's opposition due on April 30; and reply papers, if any, due on May 7. My colleague, Ethan Thomas, has discussed this request with AUSA Elinor Tarlow, and she consents to the revised schedule.

Respectfully submitted,

/s/ Christopher P Conniff

Christopher P. Conniff

cc: Elinor Lynn Tarlow, Assistant United States Attorney (via ECF)

The request for an extension is granted.  
Dated: March 30, 2020

A handwritten signature in blue ink, reading "Naomi Reice Buchwald".

NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE